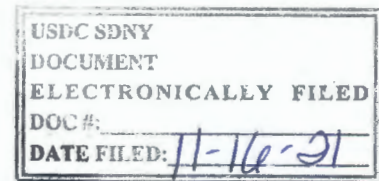


BRACEWELL

November 15, 2021

VIA ECF

Honorable Lewis A. Kaplan
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312



Re: United States v. Abdel-Wadood, 19 Cr. 233

Dear Judge Kaplan:

I write to request a modification of the bail restrictions for Mustafa Abdel-Wadood, to which the government consents. At present, Mr. Abdel-Wadood's residence is in Manhattan and his travel is limited to the Southern and Eastern Districts of New York and to Washington, D.C., where his son is in college. Mr. Abdel-Wadood pled guilty in June 2019 and is cooperating with the government in the prosecution of Arif Naqvi, the lead defendant in this case. For almost that long, Mr. Naqvi has been fighting extradition from England, a matter yet to be resolved. See Law360, "Suicide Test Ruling Delays Abraaj Founder's Extradition Case," Nov. 10, 2021. In the past 2½ years, Mr. Abdel-Wadood has complied fully with the conditions of his release. Under the circumstances, our request is that Mr. Abdel-Wadood be permitted to travel throughout the continental United States with the prior approval of Pretrial Services. (He would provide Pretrial Services with an itinerary of his proposed travel.) The expanded limits would allow him to visit friends and conduct some limited business. All other bail conditions, including the surrender of Mr. Abdel-Wadood's passport and the \$10 million bond secured by two properties, would remain in place.

As noted, the government (AUSA Andrew Thomas) consents to this proposed modification. Pretrial Services (Officer Stephen Boose) has no objection.

I thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Paul Shechtman

Paul Shechtman

cc: AUSA Andrew Thomas
P.O. Stephen Boose

Paul Shechtman
Partner

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SO ORDERED

LEWIS A. KAPLAN, USDJ